

Message

From: Dudar, Helen [DEP] [Helen.Dudar@dep.nj.gov]
Sent: 11/16/2021 1:55:03 PM
To: Nolan, Katherine [DEP] [Katherine.Nolan@dep.nj.gov]; Shah, Ram [DEP] [Ram.Shah@dep.nj.gov]; Gerchman, Michael [DEP] [Michael.Gerchman@dep.nj.gov]; Hull, Ross [DEP] [Ross.Hull@dep.nj.gov]
CC: Fontana, Anthony [DEP] [Anthony.Fontana@dep.nj.gov]; Steve.Maybury@dep.nj.gov; Kavvadias, Eleni [kavvadias.eleni@epa.gov]
Subject: RE: Chemours Chamber Works Solar - Landfill A

I recommend that the comments stay internal (for now).

The purpose of my comments is to inform the DEP and USEPA staff of the conditions at the location of the Landfill A. The staff can keep the facts in mind as Chemours presents their tentative plans.

From: Nolan, Katherine [DEP] <Katherine.Nolan@dep.nj.gov>
Sent: Tuesday, November 16, 2021 8:35 AM
To: Dudar, Helen [DEP] <Helen.Dudar@dep.nj.gov>; Shah, Ram [DEP] <Ram.Shah@dep.nj.gov>; Gerchman, Michael [DEP] <Michael.Gerchman@dep.nj.gov>; Hull, Ross [DEP] <Ross.Hull@dep.nj.gov>
Cc: Fontana, Anthony [DEP] <Anthony.Fontana@dep.nj.gov>; Maybury, Steve [DEP] <Steve.Maybury@dep.nj.gov>; Kavvadias, Eleni <kavvadias.eleni@epa.gov>
Subject: RE: Chemours Chamber Works Solar - Landfill A

Thank you Helen for your additional comments.

Question for the group: Would you like me to share the comments from Helen and Ram with the Chemours representatives ahead of the meeting? Or are these comments meant to be for internal use only?

I am happy to pass them along, or if it's something you'd rather bring up during the meeting, that is fine too. Just want to clarify.

Thanks,

Katie Nolan

Team Leader for Renewable Energy & Offshore Wind
Team Leader of Redevelopment & Restoration
New Jersey Department of Environmental Protection
Office of Permitting & Project Navigation
401 East State Street
Trenton, NJ 08625-0420

Office #: (609) 292-3600
Direct #: (609) 984-6506
Email: Katherine.Nolan@dep.nj.gov

From: Dudar, Helen [DEP] <Helen.Dudar@dep.nj.gov>
Sent: Tuesday, November 16, 2021 7:32 AM
To: Shah, Ram [DEP] <Ram.Shah@dep.nj.gov>; Gerchman, Michael [DEP] <Michael.Gerchman@dep.nj.gov>; Hull, Ross [DEP] <Ross.Hull@dep.nj.gov>
Cc: Fontana, Anthony [DEP] <Anthony.Fontana@dep.nj.gov>; Nolan, Katherine [DEP] <Katherine.Nolan@dep.nj.gov>; Maybury, Steve [DEP] <Steve.Maybury@dep.nj.gov>; Kavvadias, Eleni <kavvadias.eleni@epa.gov>
Subject: Chemours Chamber Works Solar - Landfill A

Good morning,

To add to Ram's e-mail, attached please find a memo that contains details for Landfill A. As the information within the memo indicates, this is not your ordinary landfill. There is copious amounts of contamination present related to both landfills.

BCM and the USEPA are primarily concerned with how the proposed project may impact the ability to continue investigating the soil and groundwater contamination attributed to Landfill A and to the underlying portion of SWMU 8. This concern includes the PFAS contamination attributed to the site. With the exception of groundwater sampling, these areas have not been investigated for PFAS. Both likely received PFAS waste.

This is all for now.

Helen

From: Shah, Ram [DEP] <Ram.Shah@dep.nj.gov>

Sent: Friday, November 5, 2021 11:19 AM

To: Gerchman, Michael [DEP] <Michael.Gerchman@dep.nj.gov>; Hull, Ross [DEP] <Ross.Hull@dep.nj.gov>

Cc: Fontana, Anthony [DEP] <Anthony.Fontana@dep.nj.gov>; Nolan, Katherine [DEP] <Katherine.Nolan@dep.nj.gov>;

Maybury, Steve [DEP] <Steve.Maybury@dep.nj.gov>; Dudar, Helen [DEP] <Helen.Dudar@dep.nj.gov>

Subject: RE: Chemours Chamber Works Solar

Katie:

I have reviewed the Permit Readiness Check List for the Chemours Chamber Works Solar project located in Carney's Point Township, Salem County, NJ Solar Project. Based on my review, I offer the following:

Status of the Chemours A&B Landfill

The Chemours Landfill is a Class III Landfill which is limited to accepting only Waste Type 13C, construction and demolition waste, generated exclusively at the Chambers Works site. The Landfill is comprised of two areas; Landfill A and Landfill B. They are adjacent to each other separated by Patrol Road. Landfill A, 27 acres in size, ceased operations in 1994 and Landfill B which is about 19 acres continues to operate.

The Chemours A&B Landfill is part of the 140-acre tract of land known as Solid Waste Management Unit # 8 (SWMU 8). SWMU 8 is currently being investigated by the USEPA (RCRA Programs Branch) Region II and by the Department's Site Remediation Program (SRP). Landfill A has been filled to the permitted capacity (approximately 890,000 cubic yards); however, due to the ongoing investigation, Chemours has not yet capped the Landfill A. The final cover requirements for the Landfill A consist of the following in descending order:

- a) a 6-inch topsoil layer;
- b) a 12-inch layer of clean cover soil;
- c) a geosynthetic drainage composite;
- d) a 40-mil low density polyethylene geomembrane; and
- e) a 1-foot intermediate cover material layer.

Chemours Landfill has no leachate collection system. The ground water at this site is pumped and treated at the Chambers Works Wastewater Treatment Plant.

Proposal

Chemours has proposed installation of solar panels on top of the Landfill A. The Permit Readiness Check List indicated that there was a potential to request alternate closure/cover plan based on project details . This proposal lacks details and requires further clarification from the applicant.

Thanks,

Ram

Ram Shah, Environmental Engineer 3

Division of Solid & Hazardous Waste

Bureau of Solid Waste Permitting

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Ram.shah@dep.nj.gov

From: Nolan, Katherine [DEP] <Katherine.Nolan@dep.nj.gov>

Sent: Thursday, November 4, 2021 10:20 AM

To: Dudar, Helen [DEP] <Helen.Dudar@dep.nj.gov>; Maybury, Steve [DEP] <Steve.Maybury@dep.nj.gov>; Gerchman, Michael [DEP] <Michael.Gerchman@dep.nj.gov>; Motter, Allan [DEP] <Allan.Motter@dep.nj.gov>; Young, Natalie [DEP] <Natalie.Young@dep.nj.gov>; Breder, Eric [DEP] <Eric.Breder@dep.nj.gov>; Biggins, Suzanne [DEP] <Suzanne.Biggins@dep.nj.gov>; Springer, Kim [DEP] <Kim.Springer@dep.nj.gov>; Krukowski, Eleanor [DEP] <Eleanor.Krukowski@dep.nj.gov>; Wong, Danny [DEP] <Danny.Wong@dep.nj.gov>; Eichman, Kevin [DEP] <Kevin.Eichman@dep.nj.gov>; August, Jessica [DEP] <Jessica.August@dep.nj.gov>; Kavvadias, Eleni <kavvadias.eleni@epa.gov>

Cc: Schick, Kevin [DEP] <Kevin.Schick@dep.nj.gov>; Davis, Mark [DEP] <Mark.Davis@dep.nj.gov>; Olivera, Stephen [DEP] <Stephen.Olivera@dep.nj.gov>; Myers, Stephen [DEP] <Stephen.Myers@dep.nj.gov>; Pepe, David [DEP] <David.Pepe@dep.nj.gov>; Brunatti, Megan [DEP] <Megan.Brunatti@dep.nj.gov>

Subject: Chemours Chamber Works Solar

To All;

SRP Case Management: Helen Dudar, Steve Maybury

Solid Waste: Mike Gerchman

SRP-BEERA: Allan Motter (cc: Kevin Schick)

LRP: Natalie Young, Eric Breder (cc: Mark Davis, Steve Olivera)

ODST: Suzanne Biggins

F&W: Kim Springer

Stormwater: Eleanor Krukowski

Air Permitting: Danny Wong

Air C&E: Kevin Eichman

Climate Change and Clean Energy: Jessica August (cc: Steve Myers)

EPA: Eleni Kavvadias

Site Location

67 Canal Road, Deepwater (Carney's Point Township)

Salem County, New Jersey

Block 185, Lot 1

Good Morning.

The Office of Permitting and Project Navigation has received a permit readiness checklist for the Chemours Chamber Works Solar project located in Carney's Point Township, Salem County, NJ.

The applicant has requested a meeting to discuss a potential solar project on the "A" Landfill. This project is still early in the design phase of the project so not all details are available at this time. The applicant wishes to engage with the Department on the regulatory requirements needed to construct a solar array at the site. See attached for the project information.

Please review the project information and provide your program comments to me via email (Katherine.Nolan@dep.nj.gov) by **Thursday November 18th**.

OPPN will be scheduling a meeting with all applicable parties pending a busy search starting after **November 18th**.

Thank you for your time and participation.

Katie Nolan

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